

**OUTTEN & GOLDEN LLP**

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*Attorneys for the Class  
 Representatives and the Class*

**UNITED STATES BANKRUPTCY COURT  
 EASTERN DISTRICT OF NEW YORK**

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In re	:	Chapter 11
	:	
DOWLING COLLEGE,	:	
f/d/b/a DOWLING INSTITUTE,	:	Case No. 16-75545 (REG)
f/d/b/a DOWLING COLLEGE ALUMNI	:	
ASSOCIATION,	:	
f/d/b/a CECOM,	:	
a/k/a DOWLING COLLEGE, INC.,	:	
	:	
Debtor.	:	
-----X		
	:	
LORI ZAIKOWSKI, on behalf of herself and all	:	
others similarly situated,	:	
	:	
Plaintiff,	:	Adv. Pro. No. 16-08178 (REG)
	:	
v.	:	
	:	
DOWLING COLLEGE, f/d/b/a DOWLING	:	
INSTITUTE, f/d/b/a DOWLING COLLEGE	:	
ALUMNI ASSOCIATION, f/d/b/a CECOM, a/k/a	:	
DOWLING COLLEGE, INC.,	:	
Defendant.	:	
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**DECLARATION OF CLASS COUNSEL  
 OF NO OPT-OUTS OR OBJECTIONS TO THE EMPLOYEE SETTLEMENT**

René S. Roupinian declares the truth of the following under penalty of perjury:

1. I am an attorney at Outten & Golden LLP and Class Counsel in the above-referenced case.

2. Pursuant to the Court Order of September 28, 2018 [Docket No. 31], Debtor mailed the individualized Class Notices by first-class mail to the Class Members listed on Exhibit A to the Settlement Agreement (Doc. 29-1) on September 28, 2018.

3. Ten (10) Notices were returned as undeliverable. My office was able to obtain corrected addresses for all but four (4) of these Notices, which were re-mailed between October 19, 2018 and October 31, 2018. The dates of their return and re-mailing are attached hereto as "Exhibit 1." Class Counsel continues to search for current addresses for the four remaining class members.

4. As provided in the Notice, any Class B class member wishing to be excluded from the Class had until October 29, 2018 to do so, by sending to Class Counsel a completed opt-out form. No Class B members have opted out of the Class.

5. Additionally, two Class A class members who originally requested exclusion from the Class, George Cavuto and Mary Sullivan [Docket No. 31], have rescinded their opt-outs and wish to participate in the employee settlement.

6. As provided in the Notice, any class member wishing to object to the settlement had until October 29, 2018 to do so by sending to Class Counsel a written statement with the basis of the objection. Class Counsel receive multiple questions regarding individual settlement amounts which it was able to resolve to the class members' satisfaction. No objections were received by Class Counsel.

Dated: November 2, 2018

/s/ René S. Roupinian  
René S. Roupinian